



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*86 Chambers Street, 3rd floor  
New York, New York 10007*

November 5, 2021

**BY ECF**

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED

*11/5/21*  
  
John G. Koeltl, U.S.D.J.

*Knight First Amendment Inst. et al. v. Dep't of State et al.,  
No. 20 Civ. 4911 (JGK)*

Dear Judge Koeltl:

We write respectfully on behalf of the parties in the above-referenced Freedom of Information Act ("FOIA") case to provide the Court with a status report with regard to the remaining defendants' processing of plaintiffs' FOIA request. As set forth below, the agencies are nearing the end of their productions in response to the FOIA request.

*Department of State:* State made a production on November 4, 2021, consisting of records residing on classified record systems. This production completed State's response to the FOIA request to State.

*Central Intelligence Agency:* CIA has completed its processing and production of non-exempt records responsive to the FOIA request to CIA. Pursuant to an agreement with plaintiffs, and to allow the parties to determine whether any issues remain to be litigated, CIA provided plaintiffs with a draft Vaughn index with regard to the records it withheld in full and a limited number of records identified by plaintiffs that were withheld in part.

*Office of the Director of National Intelligence:* ODNI soon will be making a production consisting of documents that ODNI had referred to other agencies for consultation. ODNI is awaiting responses to other consultation requests.

*Federal Bureau of Investigation:* FBI has completed its productions, with the exception of documents referred to other agencies or entities for consultation for which FBI is awaiting responses.

*National Security Agency:* NSA is making a small production within the next week consisting of records that had been referred to other agencies for consultation. The forthcoming production will complete NSA's response to the FOIA request to NSA, with the exception of one record referred to another agency.

The parties respectfully suggest that they provide a further status report within 60 days, or by January 4, 2022. We thank the Court for its consideration of this letter.

Respectfully submitted,

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Southern District of New York

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